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Attorneys for Defendants
Maxim Konovalov, Igor Sysoev,
Andrey Alexeev, Maxim Dounin,
Gleb Smirnoff, and Angus Robertson

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LYNWOOD INVESTMENTS CY LIMITED,
Plaintiff,

v.

MAXIM KONOVALOV, IGOR SYSOEV,
ANDREY ALEXEEV, MAXIM DOUNIN,
GLEB SMIRNOFF, ANGUS ROBERTSON,
NGINX, INC. (BVI), NGINX SOFTWARE,
INC., NGINX, INC. (DE), BV NGINX, LLC,
RUNA CAPITAL, INC., EVENTURE
CAPITAL PARTNERS II LLC and F5
NETWORKS, INC.,
Defendants.

Case No. 3:20-cv-03778- MMC

**STATEMENT OF DEFENDANTS
MAXIM KONOVALOV, IGOR
SYSOEV, ANDREY ALEXEEV,
MAXIM DOUNIN, GLEB SMIRNOFF,
AND ANGUS ROBERTSON
REGARDING PLAINTIFF'S MOTION
TO COMPEL (ECF NO. 228)**

SECOND AMENDED COMPLAINT
FILED: April 7, 2025

1 Maxim Konovalov, Igor Sysoev, Andrey Alexeev, Maxim Dounin, Gleb Smirnoff, and
2 Angus Robertson, named as defendants in the above-captioned matter (collectively, the
3 “Individual Defendants”), by and through their undersigned counsel, file this statement regarding
4 “Plaintiff’s Motion To Compel Netflix, Inc. To Comply With Plaintiff’s Subpoena,” filed by
5 plaintiff Lynwood Investments CY Limited on August 29, 2025 (ECF No. 228) (“Lynwood’s
6 Motion to Compel”).

7
8 STATEMENT OF THE INDIVIDUAL DEFENDANTS

9 Counsel for the Individual Defendants have reviewed Lynwood’s Motion to Compel and
10 the papers filed by Lynwood in support thereof, including Lynwood’s thirteen-page proposed
11 Order (ECF No. 228-1), which requests, inter alia, that the Court make rulings regarding the
12 meaning of orders entered by Judge Chesney, including rulings regarding what Judge Chesney
13 “intended.” The Individual Defendants believe that Lynwood’s Motion to Compel and the
14 papers in support thereof do not accurately reflect the state of discovery in this matter or past
15 proceedings in this action.

16 The Individual Defendants have not participated in any discussions between Lynwood’s
17 counsel and counsel for Netflix, Inc. (“Netflix”) regarding Lynwood’s subpoena to Netflix. The
18 Individual Defendants take no position on the specific issues raised in Lynwood’s Motion to
19 Compel.

20 The Individual Defendants do believe, however, that it is important for the Magistrate
21 Judge to have an accurate understanding of the history and status of this matter, to the extent
22 those subjects are relevant to the issues raised in Lynwood’s Motion to Compel or are discussed
23 at the hearing on Lynwood’s Motion to Compel scheduled for October 16, 2025. Counsel for
24 the Individual Defendants therefore plan to appear before the Court for the hearing on
25 Lynwood’s Motion on October 16, 2025, to be available to participate as needed to ensure that
26 the Court has accurate facts regarding the state of discovery in this matter, past proceedings in
27 this action, and the status of current activities in this action.

1 Dated: September 19, 2025

Respectfully submitted,

2 KING & SPALDING LLP

3 By: /s/ Bruce W. Baber

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